KATHLEEN M. CORRELL, OSB #871989 Attorney at Law Correll & Associates PO Box 13351 Portland, OR 97213 Tel: 503.284.0763 Fax: 503-44-2084

Email: kmc@kmcorrellattny.com

LAURIE BENDER, OSB#88157 Laurie Bender, P.C. The Strowbridge Building 735 S.W. First Avenue, 2nd Floor Portland, Oregon 97204

Tel: (503) 503.241.7075 Fax: 503.241.1768

Email: lbenderlaw@aol.com

OF ATTORNEYS FOR HOLLY ANN GRIGSBY

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

UNITED STATES OF AMERICA, Plaintiff.

VS.

HOLLY ANN GRIGSBY, Defendant.

No. 3:12-cr- 00431-02 (HA)

DEFENDANT GRIGSBY'S MOTION TO CONTINUE TRIAL DATE

Defendant Holly Ann Grigsby, by and through counsel Kathleen M. Correll and Laurie Bender, hereby moves this Court for an Order continuing the trial date in this matter.

Ms. Grigsby believes the ultimate trial setting and other important litigation dates can be more firmly scheduled following a Government update on the progress of its discovery audit (currently not completed) and its upcoming discovery release schedule to defendants.

Ms. Grigsby remains incarcerated at the Columbia County Jail.

The Government does not oppose Ms. Grigsby's motion. Mr. Pedersen does oppose this Motion.

This Motion is supported by the accompanying Declaration of Counsel.

DATED: February 28, 2014 , 2014.

s/ Kathleen M. Correll

KATHLEEN M. CORRELL, OSB 871989 Of Attorneys for Holly Ann Grigsby

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DEFENDANT GRIGSBY'S MOTION TO**

CONTINUE TRIAL DATE on the following attorneys by electronic case filing, a full and correct copy thereof on the _28th day of February, 2014:

Ms. Amanda Marshall
United States Attorney for Oregon
Scott Asphaug
Assistant United States Attorney
Suite 600
1000 SW Third Avenue
Portland, OR 97204-2902

Renee Manes Federal Public Defender's Office 101 SW Main St, Ste 1700 Portland, OR 97204

Mr. Richard Wolf, PC 12940 NW Marina Way, Slip A Portland, OR 97231

s/ Kathleen M. Correll

Kathleen M. Correll Of Attorneys for Defendant Holly Grigsby